

AMENDMENTS

In the Specification:

Please cancel claims 33 and 34.

REMARKS

Claims 33 and 34 have been cancelled. Claims 12-16 and 27-32 are pending and stand rejected.

In the Examiner's comments accompanying the office action, it is stated that claims 12-16 and 27-34 stand rejected as obvious over U.S. Patent No. 5,543,789 of Behr et al. in view of U.S. Patent No. 5,712,901 of Meermans.¹ Claims 16 and 30 stand rejected as obvious over Behr in view of U.S. Patent No. 6,240,448 of Imielinski et al. Applicants submit that, for the reason presented below, the rejected claims are patentable over the cited references.

The § 103 Rejection of Claims 12 - 15, 27-29, 31 and 32 as Obvious over Behr in view of Meermans

Independent claims 12 and 27 each explicitly recite a "text-to-voice processor"

¹Applicants believe that the Examiner inadvertently included claims 16, 30, 33 and 34 as part of this rejection on page 2 of the remarks accompanying the office action because in the subsequent discussion of the references' relevance on pages 3 and 4, there is no discussion of claims 16, 30, 33 and 34. Accordingly, applicants do not present arguments concerning the patentability of these claims *with respect to the combination of the Behr and Meermans references*. Applicants do, however, present arguments concerning the patentability of claims 16 and 30 over the Behr and Imielski references as discussed.

that provides responsive information in a voice or audio format. The claim further recites that the responsive information is then provided to a "voice mailbox." Neither Behr nor Meermans discloses these elements arranged as such. Accordingly, the combination of Behr and Meermans fails to present a *prima facie* case of obviousness of claims 12 and 27.

As stated in applicant's previous submittal, Behr discusses only a "mobile unit" that can "digitally synthesize voice which audibly presents the travel directions to the user." (col. 4, ll. 33-34). Behr nowhere discloses the use of a text-to-voice processor, the output of which is directed to a remote voice mailbox for storing the synthesized voice.

As to Meermans, it simply does not disclose a text-to-voice processor. Meermans merely discloses a human operator, referred to also as a "communications assistant (CA), who manually translates text messages to voice." (See Fig. 1, element 24, col. 4, lines 52-64). Communications assistant 128 is not a "text-to-voice processor" which - in the common sense as well as is used in the specification of the present invention - is a computer based system that translates computer based text words to speech. Thus, because the combination of Behr and Meermans fails to disclose a text-to-voice processor that provides responsive information in a voice or audio format to a voice mailbox, the combination fails to present a *prima facie* case of obviousness as to claims 12 and 27.

Moreover, even if the combination of Behr and Meermans does indeed disclose all of the recited limitation of claims 12 and 27 (which it does not) neither reference presents a motivation to combine one with the other. Behr is directed to "providing route guidance information from a base unit to a mobile unit in response to a request from the mobile unit." (Col. 2, lines 51-52). In other words, Behr only contemplates that the *requesting unit* receives the requested information. Meermans, on the other hand, does not request information, but instead facilitates the delivery of information (a simple message left by the caller) to be sent to a device associated with the user. Thus, the references utilize different methods to achieve different goals and, accordingly, do not suggest to one skilled in the art that they be combined to arrive at the claimed invention.

Thus, applicant respectfully submits that claims 12 and 27 are patentable over the cited references. Additionally, applicant respectfully submits that claims 13-15 (which depend from claim 12) and claims 28, 29, 31 and 32 (which depend ultimately from claim 27) are patentable over the cited references based on their dependence from the independent claims and their own further limitations.

The § 103 Rejection of Claims 16 and 30
as Obvious over Behr in view of Imielinski²

Similar to the above, claims 16 and 30 are patentable over the cited combination of references because the combination of Behr and Imielinski fails to present a *prima facie* case of obviousness. In particular, neither reference mentions a voice mailbox or use of a voice mailbox for receiving forwarded requested information which are explicit limitations of claims 12 and 27 from which claims 16 and 30 respectively depend.

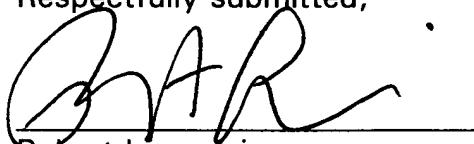
Additionally, nothing in Behr or Imielinski suggests their combination with each other to arrive at the present invention. Behr deals with user specific requests for information followed by a unique look-up of that information in accordance with the request. Imielinski is directed to general access of publically available information posted on a web page. One skilled in the art would not be lead to combine the references to arrive at the claimed invention which includes provision of responsive information in a voice or audio format directed to a voice mailbox.

For the reasons stated above, applicant respectfully submits that the pending claims are patentable over the cited references and respectfully requests indication of the same.

²The examiner's reference to "Musk et al" at page 5 of the office action is assumed to be a typographical error which meant to reference Imielinski. This is because the introduction of the remarks concerning the rejection of claims 16 and 30 on page 4 mentions only Behr and Imielinski.

If there are any other issues remaining which the Examiner believes could be resolved through either a Supplemental Response or an Examiner's Amendment, the Examiner is respectfully requested to contact the undersigned at the telephone number indicated below.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'RLA', is written over a horizontal line.

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